

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

TSDC, LLC	)	Civil Case No.: 1:14-cv-02699-DCN
	)	
Plaintiff,	)	JUDGE DONALD C. NUGENT
	)	
v.	)	
	)	
Ann (Antoinette) Galvan, <i>et al</i>	)	<b>REPLY CONCERNING DEFENDANTS'</b>
	)	<b>MOTION TO COMPEL</b>
	)	<b>DISCOVERY AND MOTION FOR</b>
	)	<b>SANCTIONS (ECF #29) AND</b>
Defendants.	)	<b>RELATED ORDER (ECF #38)</b>
	)	

The Defendants do not withdraw their Motion to Compel Discovery and Motion for Sanctions filed on November 16, 2015 (ECF #29). The Defendants' review of the Plaintiff's responses and production of documents found that Plaintiff has not substantially complied with the Defendants' discovery requests.

Pursuant to the Court's Order (ECF #38) the Plaintiff produced some answers to the Defendants' interrogatories and a number of documents on January 6, 2016. The Defendants have in good faith reviewed the Plaintiff's responses and have found that Plaintiff has not substantially complied with the Defendants' discovery requests.

At the Status Conference on January 15, 2016 and on January 19, 2016 the Defendants told Plaintiff about the deficiencies in the Plaintiff's responses. The Defendants' counsel is attempting to arrange a Meet and Confer with Plaintiff's counsel to talk further concerning this matter.

Respectfully submitted,

/s/ Patricia A. Walker

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### **CERTIFICATE OF SERVICE**

I hereby certify that on the 20th day of January, 2016 I caused the foregoing Reply Concerning Defendants' Motion To Compel Discovery and Motion For Sanctions (ECF #29) and Related Order (ECF #38) to be electronically filed with the Clerk of Court using the CM/ECF system which will send notification of such filing to all of the attorneys of record.

/s/ Patricia A. Walker

Patricia A. Walker